

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	CRIMINAL NO. 19-cr-10335-DJC
TANMAYA KABRA,	)	
Defendant.	)	
	)	
_____	)	

**JOINT INITIAL STATUS REPORT**

Pursuant to Local Rule 116.5(a), the parties hereby file the following joint initial status report prepared in connection with the initial status conference scheduled for November 5, 2019.

(1) Automatic Discovery/Pending Discovery Requests

The Government provided automatic discovery to the defendant on October 11 and October 17, 2019 and provided supplemental discovery on October 24, 2019.

(2) Additional Discovery

The Government anticipates receiving further productions of documents in this case and anticipates it will provide additional discovery when it receives these productions.

(3) Timing of Additional Discovery Requests

Defendant is reviewing discovery and, at this time, is reserving the need for further discovery requests.

(4) Protective Orders

The Government has filed an assented-to motion for a protective order. *See* Doc. No. 52.

(5) Pretrial Motions

The defendant has not filed any pretrial motions under Fed. R. Crim. P. 12(b). He reserves the right to file such a motion or motions after additional review of the discovery.

(6) Expert Discovery

The Government agrees to provide any expert witness disclosures 21 days prior to trial. The Defendant agrees to provide any expert witness disclosures 14 days prior to trial.

(7) Speedy Trial Act

The time from the date of the arraignment through September 27, 2019 is automatically excludable because of the then-pendency of the Defendant's Motion to Revoke Detention Order and for Pretrial Release. *See* 18 U.S.C. §§ 3161(h)(1)(D), (H).

The parties request that the time be excluded from September 27, 2019 until the date of the initial status conference scheduled for November 5, 2019 and further request that time be excluded until the interim status conference.

(8) Next Status Conference

Given all of the foregoing information, the parties request that the initial status conference, scheduled for November 5, 2019, be canceled. The parties request that an interim status conference be scheduled in approximately 40 days.

Respectfully submitted,

<p>TANMAYA KABRA,</p> <p>By his attorneys,</p> <p><u>/s/ Mark A. Berthiaume</u></p> <p>Mark A. Berthiaume Angela Bunnell Greenberg Traurig One International Place, Suite 2000 Boston, MA 02110 617.310.6007</p> <p>Gregory L. Johnson Yannetti Law Firm 44 School St., #1000A Boston, MA 02108 617-338-6006</p>	<p>UNITED STATES OF AMERICA,</p> <p>By its attorney,</p> <p>ANDREW E. LELLING United States Attorney</p> <p><u>/s/ Christopher Looney</u></p> <p>Christopher Looney Assistant United States Attorney 408 Atlantic Avenue, Suite 530 Boston, MA 02210 (617) 748-3287</p>
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Dated: October 29, 2019

**CERTIFICATE OF SERVICE**

Undersigned counsel certifies that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Christopher Looney  
Christopher Looney  
Assistant United States Attorney

Dated: October 29, 2019